



The role of civil servant investigators in Maluku Province's law enforcement of intellectual property rights violations

Devi Safitri¹, Juanrico Alfaramona Sumarezs Titahelu², Hadibah Zachra Wadjo³

¹ Master of Law Student, Legal Studies Program, Postgraduate Pattimura University, Ambon, Maluku, Indonesia

² Professor, Department of Criminal Law, Faculty of Law, Pattimura University, Ambon, Maluku, Indonesia

³ Associate Professor, Department of Criminal Law, Faculty of Law, Pattimura University, Ambon, Maluku, Indonesia

Abstract

This study aims to examine and analyze the existence and authority of Civil Servant Investigators of Intellectual Property in enforcing the law against Intellectual Property Rights (IPR) violations in Maluku Province, as well as to identify various obstacles encountered in its implementation. Intellectual Property Rights (IPR), as part of human rights with economic value, require effective legal protection, especially amid the increasing number of registrations and IPR violations. Data from the Directorate General of Intellectual Property indicates that IPR violations remain quite high, while in the Maluku Province, law enforcement capacity has not yet been fully optimized due to the limited number and organizational structure of enforcement at the regional level. This research is a normative legal study with an approach based on legislation, conceptual, and case studies. The primary legal materials consist of legislation related to intellectual property rights (IPR) and criminal procedural law, while secondary legal materials are obtained from literature, journals, and other scholarly works. The analysis was conducted descriptively and qualitatively.

The research results show that Civil Servant Investigators of Intellectual Property have investigative authority based on the Criminal Procedure Code (KUHAP) and sectoral Intellectual Property laws, including the receipt of reports, examinations, seizures, and case transfers. However, in practice, there are obstacles such as limited human resources, minimal supporting facilities, and dependence on coordination with the Police and the Directorate General of Intellectual Property at the central level. Therefore, institutional strengthening, capacity building for Civil Servant Investigators, and optimization of coordination among law enforcement agencies are needed to achieve effective Intellectual Property legal protection and provide legal certainty in the Province of Maluku.

Keywords: Civil servant investigators, law enforcement, intellectual property rights, Maluku

Introduction

These provisions form the philosophical basis of the TRIPs agreement. However, the implementation of this agreement has prompted pressure from developed nations, particularly the United States, which bases its demands on Indonesia's international obligations. This pressure has forced Indonesia to revise its intellectual property rights legislation and required other TRIPs member nations to adjust their national laws to comply with the provisions specified in the agreement^[1].

Efforts are necessary to build procedures for the implementation of Intellectual Property Rights (IPR) within the context of free commerce. The problems primarily stem from a fundamental demand: the right to own, control, and utilize various discoveries, creations, or works generated through an individual's skills, efforts, or intellectual pursuits. A growing worry pertains to the ownership rights of a work, especially when it includes materials or elements sourced externally. The complexity of the issue has intensified alongside historical developments, particularly marked by the onset of the industrial revolution in England and the political revolution in France^[2].

The existence of investigative authority is crucial in the law enforcement process for criminal charges associated with Intellectual Property Rights (IPR). Investigations should not be considered trivial, as this phase is crucial for uncovering facts, identifying perpetrators, and gathering evidence that supports any prosecution or trial. Without an effective and methodical investigative process, the enforcement of

intellectual property rights (IPR) criminal law will be weakened, thereby jeopardizing the safeguarding of the exclusive rights of IPR holders.

Article 1, Paragraph 1 of Law Number 8 of 1981 of the Republic of Indonesia concerning Criminal Procedure stipulates that investigators are officials of the National Police of the Republic of Indonesia or appointed civil workers possessing recognized legal authority to conduct inquiries. Investigators are primarily tasked with seeking and collecting evidence that clarifies the crime and identifies the culprit. Investigations include search and seizure actions, as well as investigations aimed at the perpetrators involved. This seizure falls under the jurisdiction of the National Police as investigators, often requiring seizures, even if temporary, especially when there is suspicion of criminal activity.

The Directorate General of Intellectual Property (DJKI) within the Ministry of Law of the Republic of Indonesia recorded 296 cases of intellectual property (IP) infringement from 2019 to 2025. This data indicates that violations of intellectual property rights remain a substantial issue requiring collective attention. Summary data from the Directorate of Law Enforcement of the DJKI indicates that the predominant infractions pertained to trademarks, totaling 163 instances, followed by copyright with 87 cases, and patents with 21 incidents. The exceptional cases were violations in industrial design (DI), integrated circuit layout design (DTLST), and trade secrets (RD). The years 2023 and 2024 were identified as the periods with the highest

occurrence, each recording 53 incidents. By mid-2025, the documented transgressions decreased to 31 instances, encompassing those in Maluku Province^[3].

However, the reality demonstrates that although the trend of IPR registration in Maluku Province is increasing, it has not been matched by the quality of law enforcement. A principal impediment is the limited number of Civil Servant Investigators (PPNS) specializing in Intellectual Property Rights (IPR) at the Maluku Regional Office of the Ministry of Law, combined with the persistent reliance on the Directorate General of Intellectual Property (DJKI) of the Ministry of Law of the Republic of Indonesia, leading to restricted authority in addressing violations. This circumstance creates a discrepancy between formal recognition through registration and actual protection, thereby eroding legal certainty and reducing the effectiveness of the intellectual property rights protection system in Maluku Province.

The organizational structure of the Directorate General of Intellectual Property includes a dedicated component tasked with the investigative process, namely the Directorate of Investigation and Dispute Resolution. The Intellectual Property PPNS officer functions as an investigator. As a PPNS officer specializing in Intellectual Property, I conduct investigations into criminal infringements in this field and hold statutory authority on Intellectual Property issues. The use of this authority is regulated by the Decree of the Minister of Law and Human Rights No. M.HH-01.H1.07.02 of 2015, which delineates the Guidelines for the Implementation of Criminal Investigation Management in the Domain of Intellectual Property.

The establishment of this unit is to ensure that investigations into alleged intellectual property violations are not only dependent on law enforcement agencies. This specialized structure seeks to improve the efficacy, concentration, and responsiveness of the investigative mechanism to public requests, while simultaneously strengthening the legal protection of intellectual property rights, particularly in Maluku Province.

Method of the Research

This study adopts a normative juridical approach, employing a descriptive-analytical method. The research is based on the analysis of primary, secondary, and tertiary legal materials. The approaches applied include the statutory approach and the conceptual approach. Legal materials are collected through documentary research (literature review)^[4] and subsequently analyzed using qualitative methods to comprehensively address the legal issues examined.

Result and Discussion

A. The Concept of Investigation in the Indonesian Criminal Justice System

According to the Criminal Procedure Code, an investigation is a series of steps that investigators take to find and gather evidence that will help them figure out what happened and who might be to blame. This process includes issuing a summons, making an arrest, holding someone, searching them, and taking their things in order to enforce the law while still respecting people's rights. The Indonesian National Police are in charge of the main investigation. The Civil Servant Investigators Agency (PPNS) and the Attorney General's Office help with special criminal acts^[5].

To perform investigative duties and exercise authority, an investigator must fulfill specific requirements or qualifications. Articles 6 and 10 of the Criminal Code mandate that investigators must be officials of the Indonesian National Police and/or designated civil servants (PPNS) endowed with specific legal authority, whereas assistant investigators are officials of the Indonesian National Police appointed by the Chief of the Indonesian National Police^[6].

The rank prerequisites for investigators and assistant investigators are delineated in Articles 2 and 3 of Government Regulation No. 27 of 1983 regarding the execution of the Criminal Code. It stipulates that police investigators must possess a minimum rank of assistant second lieutenant, while PPNS must hold at least the rank of junior administrator (Class II B). Additionally, assistant police investigators are required to have a minimum rank of second sergeant, and PPNS must attain at least the rank of junior administrator (Class II A).

The Chief of the Indonesian National Police possesses the authority to appoint investigators and assistant investigators, whereas PPNS investigators are appointed by the Minister following consultations with the Attorney General and the Chief of the Indonesian National Police. To qualify as a professional investigator, one must possess knowledge in law, policing, and related disciplines, as outlined in the investigator qualification requirements mentioned above.

B. Intellectual Property Rights Violation Investigation Mechanism

The Criminal Procedure Code (KUHAP) sets the rules for how criminal cases are handled in Indonesia. The Integrated and Integral Criminal Justice System is in charge of handling criminal cases. Four law enforcement agencies are in charge of it: the Police, the Prosecutor's Office, the Courts, and Community Institutions.

In addition to these four institutions, specific authority is granted to appointed civil servant investigators within ministries, as specified by law. The investigators work for the Ministry of Law (Dirjen KI) and are responsible for protecting intellectual property rights. These officials have the power to look into claims of patent violations. The Directorate General of Intellectual Property has a special division called the Directorate of Investigation and Dispute Resolution that is in charge of the investigation process. The Civil Servant Investigator must use their legal power to investigate with care and professionalism. If the investigation finds evidence of a crime, the criminal case may move on to the prosecution and trial stages. If the suspect or defendant is found guilty, they may face criminal penalties according to the laws and rules that apply. It is important to understand that the Civil Servant Investigator may ask the Indonesian National Police Investigator for help with the investigation. The Civil Servant Investigator must let the public prosecutor know that the investigation is starting and send a copy to the Police Investigator.

The Police Investigator gives the public prosecutor the results of the Civil Servant Investigator's investigation. The Civil Servant Investigator needs to be involved in the investigation process so that they can help the police do their jobs. Criminal acts, which include intentional and illegal actions or violations of legal provisions, must be

carried out in accordance with applicable laws and regulations. The goal is to stop criminals and teach others.

The investigation phase includes a lot of work done by Civil Servant Investigators, such as looking at the crime scene and questioning witnesses, experts, and/or suspects. During a case conference, it is decided that a person can be named as a suspect if at least two pieces of evidence are found. A letter about the decision to suspect someone will be sent to the public prosecutor, the person who made the complaint, and the person who is being suspected.

The last case conference is when it is decided whether a criminal case should be sent to the public prosecutor. The Civil Servant Investigator team will explain the main points of the case, how it was carried out, and what happened at the conference. After that, the attendees will talk about it and come to a conclusion. When the criminal case is handed over to the public prosecutor, the case file, suspect, and evidence will be sent to the civil servant investigators' coordinator and supervisor.

The process that Civil Servant Investigators at the Intellectual Property Office use to look into intellectual property crimes is looked at. Know how to file a complaint, ask questions, and use mediation to settle a disagreement. One important thing to remember is that people can tell Civil Servant Investigators at the Intellectual Property Office about crimes or violations of intellectual property. Not only registered intellectual property owners can file these kinds of complaints, but also registered licensees or their legal representatives (lawyers). Intellectual property crimes are handled based on how hard the case is, which can be easy, medium, or hard. Also, crimes involving copyright, related rights, patents, or simple patents must go through mediation before any other steps can be taken. We can also help with other types of intellectual property if you ask. The 2025 Criminal Procedure Code defines evidence more clearly and completely than the one that came before it. Valid evidence includes the following categories: Witness testimony is the main type of evidence used in criminal cases. Witness testimony is defined as a statement made by someone who has heard, seen, or been involved in a crime. The 2025 Criminal Procedure Code says that witness testimony is judged not only by how the witness looks in court, but also by how good the testimony is, how consistent the statement is, and how well it fits with other evidence. The 2025 Criminal Procedure Code also makes witness protection better by making it illegal to use threats, force, or cruel treatment during the questioning process. Witness testimony alone cannot determine the defendant's guilt; it necessitates corroboration from additional evidence, in accordance with the principle of minimal proof.

Expert testimony is an opinion given by someone who has specialized knowledge about the topic being discussed. The 2025 Criminal Procedure Code identifies expert testimony as a crucial form of evidence, particularly in cases requiring technical, scientific, or professional assessment, such as corruption, cybercrime, environmental offenses, and economic crimes. The fundamental difference between witnesses is the subject of their evidence. Experts do not clarify the facts of an event; rather, they provide an assessment or judgment based on their expertise. Thus, the expert's independence and skill are the main factors that decide how important their evidence is. Letter evidence includes any written documents related to a crime, whether they were made by authorized officials or not. The 2025

Criminal Procedure Code defines letters as both physical and electronic documents, as long as they meet the standards of authenticity and integrity. Letters can show that a legal event, legal relationship, or certain facts are important to a criminal case. The evidentiary value of the evidence depends on where it came from, what it says, and how well it fits with other evidence. A defendant's statement is what the defendant says happened in the crime they are accused of. The 2025 Criminal Procedure Code (KUHAP) says that a defendant's testimony is not independent evidence and cannot be obtained through coercion. A defendant's confession is only useful as evidence if it is made freely, without any pressure, torture, or coercion. Because of this, the 2025 Criminal Procedure Code says that the defendant has rights as a legal entity that must be respected, not just as something to be looked at.

Evidence is any physical thing that is directly or indirectly connected to a crime. Evidence can include tools used to commit a crime, things taken from the crime scene, or other things that are related to the crime. The 2025 Criminal Procedure Code has stricter rules for how to handle evidence, including how to take it, store it, and destroy it. The 2025 Criminal Procedure Code clearly says that electronic evidence is real evidence. Electronic evidence includes any information or data that is created, sent, received, or stored electronically. This includes emails, instant messages, digital recordings, transaction data, and system logs. Electronic evidence must meet the standards of authenticity, integrity, and traceability. This rule brings the 2025 Criminal Procedure Code up to date with new trends in crime and changes in information technology.

The 2025 Criminal Procedure Code says that judicial observations can be used as evidence. The judge gets these observations directly from the trial, like how the defendant acts, the state of the evidence, or facts that come to light in the courtroom. Nevertheless, the judge's observations ought not to be exclusively subjective; they must be based on concrete and logical facts, and aligned with supplementary evidence. The 2025 Criminal Procedure Code allows different kinds of evidence as long as they are used for evidentiary purposes and obtained correctly. This provision shows how flexible the evidentiary system is and how criminal procedural law can keep up with changes in society.

C. The Authority of the Intellectual Property PPNS in Enforcing the Law on Intellectual Property Rights Violations

Many papers, such as the Minutes of the case conference (Wasmatlitrik), the Incident report, the Task order, the Investigation order, and the Notification letter of initiation of investigation, start investigations into intellectual property crimes.

Today, advances in information technology make it easier for people to get information from all over the world, even about things that are important to daily life. These products usually have a "brand" that sets them apart from other similar products. Brands are important to people who buy things because they tell them what the quality and features of the products are.

Article 1, number 1 of Law No. 20 of 2016 about Trademarks and Geographical Indications says that a trademark is a sign that can be shown graphically as an image, logo, name, word, letter, number, arrangement of

colors, in 2 (two) and/or 3 (three) dimensions, sound, hologram, or a mix of 2 (two) or more of these things to set goods and/or services apart.

For instance, applying for trademark registration by copying a well-known trademark that has already been registered or making fake goods with the logos of registered trademarks for personal gain. The government has given the Directorate General of Intellectual Property the job of protecting intellectual property rights. DJKI has the power to not only do administrative registrations, but also to enforce the law. If you use trademarks that are very similar to registered trademarks owned by other people for similar goods and/or services, you could go to jail for up to four years and/or pay a fine of up to IDR 2,000,000,000.00 (two billion rupiah). If someone uses a trademark that is very similar to a registered trademark and the goods they sell could hurt people, damage the environment, or even kill people, they could go to jail for up to 10 years and pay a fine of up to IDR 5,000,000,000.00 (five billion rupiah). As an archipelago with a lot of culture, natural resources, and creative communities, Maluku Province has a lot of potential for the growth of Intellectual Property Rights.

This includes traditional music, crafts that use local knowledge, new Maluku dishes, and many other forms of intangible cultural heritage that are still growing. But people don't know enough about the law to protect Intellectual Property Rights when they use this potential. Because of this, violations of Intellectual Property Rights are common in Maluku and happen in many ways, both online and offline. The most common types of IPR violations are music piracy, using cultural motifs without permission, and infringing on local products' trademarks. There are many real-life examples of these three types of violations that can be studied as part of the legal and social phenomena in Maluku.

People in Maluku and all over the country love Maluku music, which includes Ambonese songs, religious music, Maluku pop songs, and traditional music. But this popularity doesn't mean that IPR protection is working well. In Maluku, music piracy usually happens when people make copies of CDs and DVDs without permission and upload them to digital platforms like YouTube, TikTok, and Facebook.

People use songs at parties, cafes, and other commercial events without paying royalties. One example of this common problem is that people and businesses use Ambonese songs in social media posts without asking the creators or paying them. At the same time, local songwriters often don't know how to register their work, so they can't take legal action when someone breaks the law.

Fashion and graphic design companies often use local motifs like the Pattimura motif, the Cakalele motif, the Pela Gandong icon, and even traditional regional ornaments without asking permission from traditional communities or giving credit to the cultural source. Many clothing lines in Ambon and the surrounding area make t-shirts with these cultural symbols on them without getting permission or even talking to traditional leaders. In handicrafts, for example, cultural motifs are used as commercial decorations without giving credit to the people who own traditional cultural expressions. In 2024, there was a case where other MSMEs copied the name and packaging of the "Bagea Mama Beta" brand to sell similar products. This case was only resolved through discussion because the

original owner had not registered the brand. Civil Servant Investigators (PPNS) have the power to punish people who break intellectual property laws. Law enforcement in the area of intellectual property is very important for keeping the creative economy system honest and making the country more competitive. Intellectual property, including copyrights, trademarks, patents, industrial designs, and other types of intangible property, is a valuable asset that comes from human creativity, innovation, investment, and intellectual work.

However, advancements in technology and a lot of trade have made IP violations worse by making piracy, trademark counterfeiting, and unauthorized use of works more complex and sophisticated. In this situation, the government needs to give law enforcement the tools they need to do their jobs well. One of these tools is having Civil Servant Investigators who work in the field of Intellectual Property. According to the law, the Civil Servant Investigators can get reports, do investigations, call witnesses and suspects, take evidence, search places, and write investigation reports. These reports are then given to the Prosecutor's Office in coordination with the Indonesian National Police. The PPNS is a special investigator that the law says must look into claims of IP violations.

The rules that give the Civil Servant Investigator for Intellectual Property their power include Law Number 28 of 2014 about Copyright, Law Number 20 of 2016 about Trademarks and Geographical Indications, and the parts of the Criminal Procedure Code that talk about investigations. These rules give the Civil Servant Investigators both formal power and real responsibility to make sure that intellectual property violations are dealt with professionally, quickly, and effectively.

The fact that there are Civil Servant Investigator for Intellectual Property shows that the state takes IP protection very seriously. The creation of the Civil Servant Investigators IP by the Ministry of Law shows that the government is committed to upholding the rights of its citizens, including their immaterial rights. Many intellectual property violations could go unpunished because general investigative agencies don't have the resources to handle them all.

In practice, the PPNS makes it easier and faster to deal with intellectual property violations. This is important because some intellectual property cases need technical knowledge that regular investigators don't always have. For example, they need to know about the doctrine of substantive similarity in trademark cases, digital forensics techniques in digital content piracy, or substantive analysis of industrial design distinctiveness. The Civil Servant Investigators can directly access data from the Directorate General of Intellectual Property, which helps them make sure they are right about who owns rights.

Friedman says that the three pillars of legal structure, legal substance, and legal culture affect how well the police do their jobs. The Civil Servant Investigators are part of the structure that helps law enforcement in the Intellectual Property context. This structure decides how the law is carried out. If there aren't enough Civil Servant Investigator for Intellectual Property, the training isn't good enough, or the coordination with the Indonesian National Police isn't good enough, the Civil Servant Investigators authority won't work. The Civil Servant Investigators have the power to make rules, but if their structure is weak, Intellectual

Property violations may go unpunished or even go unpunished at all ^[7].

Intellectual property laws and rules are very detailed, but problems come up when the law doesn't keep up with changes in technology. Some examples are digital piracy, using AI in the wrong way, or selling fake goods through e-commerce sites. The Public Prosecutor often has trouble enforcing rules that don't clearly cover these new types of crimes. Indonesian society still has a legal culture that is lenient toward Intellectual property violations. People often buy pirated goods, use illegal software, and don't report intellectual property violations very often ^[8].

A weak legal culture makes it harder for the Civil Servant Investigators to do their jobs because people don't know enough about the law to help with enforcement efforts. So, the Civil Servant Investigators' authority can only work well if the public's legal culture changes through education. The existence of the Civil Servant Investigators gives creators, business people, and the public legal certainty in both social and economic terms ^[9]. The state makes sure that creative works are as safe as possible with the help of the Civil Servant Investigators. This encourages new ideas and investments. IP violations will become common if there isn't strong law enforcement. This will hurt the creative industry and slow down economic growth.

Using music at parties, cafes, lounges, and karaoke bars without paying royalties to the Collective Management Institution is another way to break copyright. For example, in Ambon City, some entertainment venues play local and national songs as part of their business, but they don't have the right licenses to do so ^[8]. The Indonesian Music LMK found a similar case when they checked out a number of hotels and restaurants in Ambon in 2025. A lot of them didn't have the right music licenses. Law enforcement, on the other hand, hasn't been very effective because most businesses don't know what their legal responsibilities are and the local government doesn't have a clear way to enforce them ^[10].

As stated in Article 99, paragraph (1) of Law No. 20 of 2016, the Directorate General of Intellectual Property has the power to look into claims of intellectual property crimes. In addition to the Indonesian National Police's investigation officers, some civil servant investigation officers in the ministry that handles government affairs in the legal field are also given special powers to look into trademark crimes, as stated in the law that governs criminal procedure ^[11].

According to Article 1, points 24 and 25 of the Criminal Procedure Code, these people can report or file complaints about trademark violations, whether they are registered or still pending, with the Directorate General of Intellectual Property. Article 100 of Law No. 20 of 2016 outlines the following criminal intellectual violations. If someone uses a trademark that is basically the same as another person's registered trademark for similar goods and/or services, they can be sent to prison for up to five years and/or fined up to Rp. 2,000,000,000.00 (two billion rupiah). If someone uses a trademark that is basically similar to another person's registered trademark for similar goods and/or services, they can be sent to prison for up to four years and/or fined up to Rp. 2,000,000,000.00 (two billion rupiah). Intellectual property crimes are usually complaint-based offenses, which means that the person who files the complaint must be the one who lost something, and the public prosecutor can't bring charges without a complaint.

In the digital age, music piracy in Maluku has become more common thanks to social media sites. People often use Ambonese songs in videos without asking for permission or giving credit to the people who made them. People in Ambon, Central Maluku, and even the Maluku diaspora abroad often use songs like "Beta Jang Marah," "Sio Mama," or "Ale Rasa Beta Rasa" in their TikTok videos. People often complain about using songs to advertise MSME products without the song owner's permission. For instance, people who make local bagea cakes or eucalyptus oil use short clips of well-known Ambonese songs in their ads on Instagram and TikTok. Law No. 28 of 2014 clearly protects the economic rights of creators, so this practice is clearly against the law. Several fashion companies in Ambon have made clothes and accessories in the last few years that use Maluku cultural patterns, like the cakalele, tifa, kora-kora ship, and pela gandong patterns. But most of the time, they don't ask the indigenous groups that own the motifs for permission.

Conclusion

The Civil Servant Investigator for Intellectual Property has the authority to receive reports, conduct investigations, summon witnesses and suspects, confiscate evidence, conduct searches, and prepare investigation reports for alleged violations of intellectual property law, which are then transferred to the Prosecutor's Office in coordination with the Indonesian National Police. Civil Servant Investigator act as special investigators mandated by law to conduct investigations into violations of intellectual property law. Obstacles faced by Civil Servant Investigator for Intellectual Property in enforcing the law on intellectual property violations include the limited function of an extension of the Directorate General of Intellectual Property in regional offices, overlapping duties, functions, and positions of Civil Servant Investigator in regional offices of the Ministry of Law, and public ignorance of the existence of Civil Servant Investigator for Intellectual Property in regional offices of the Ministry of Law.

References

1. Saifudien DJ. Sejarah Hak Kekayaan Intelektual (HKI). Jakarta: Gramedia, 2014, 9.
2. Paserangi H. Perlindungan Hukum Hak Cipta Software Program Komputer di Indonesia. *Jurnal Hukum Ius Quia Iustum*, 2011:18:20-35.
3. <https://www.dgip.go.id/artikel/detail-artikel-berita/pelanggaran-kekayaan-intelektual-capai-296-kasus-dalam-tujuh-tahun-djki-perkuat-langkah-penegakan-hukum?kategori=liputan-humas>. Diakses pada tanggal 4 Januari 2026 pukul 09.35 WIT.
4. Irwansyah. Penelitian Hukum Pilihan Metode dan Praktik Penulisan Arikel. Yogyakarta: Mirra Buana Media, 2020, 34.
5. Dalimunthe IF, Puluhulawa FU, Wantu FM. Desain Penuntutan Hukum Pidana Dalam Sistem Peradilan Pidana di Masa Yang Akan Datang. *Philosophia Law Review*, 1(1), 1-21.
6. Titahelu JAS. Dissemination of Mechanisms for Handling Criminal Cases in Criminal Procedure Law. *AIWADTHU: Jurnal Pengabdian Hukum*, 2023:3(1):33-42. DOI: <https://doi.org/10.47268/aiwadthu.v3i1>.
7. Friedman ML. American Law an Introduction. Jakarta: Tetanusa, 2021, 65.

8. Salman O, Susanto A. Teori Hukum, Mengingat, Mengumpulkan dan Membuka Kembali. Bandung: Refika Aditama, 2004, 88.
9. Angraeni BS, Majid PS. Legal Protection of Music Copyrights in Public Commercial Spaces: A Case Study of Coffee Shops in Kolaka Utara Regency, Indonesia. *Constitutional Law Review*, 2025;4(2):151-169. DOI: <https://doi.org/10.30863/clr.v4i2.5950>.
10. Ali Z. Metode Penelitian Hukum. Jakarta: Sinar Grafika, 2011, 87.
11. Sopacua MG, Titahelu JAS. Judicial System Obstacles to Handling Criminal Acts of Corruption In the Procurement of Goods and Services Island-Based. *International Journal of Law, Policy and Social Review*, 2025;7(4):108-111.